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United States Bankruptcy Court

Re:

District of New Jersey

**Joseph O'Conno
Robin O'Connor**

**Case No: 18-18594
Chapter 13
Judge: Christine Gravelle
Hearing date: 6/6/18 9 AM**

Debtor's Motion to Extend the Automatic Stay

Pursuant to 11 U.S.C. 362 (c) (3) (B), the debtors by and through the undersigned counsel is requesting an order for continuation for the automatic stay against all creditors and makes the following representation in support of this request.

1. This Chapter 13 case was filed on April 29, 2018.
2. The debtors filed a previous Chapter 13 case dismissed within one year preceding the filing of this Chapter 13. Case NO. 17-27161 was dismissed on 3/30/18.
3. Case No. 17-27161 was filed with good faith intentions and the debtors had been diligent with their payments to both the trustee and to the mortgage company.
4. The Trustee filed the motion to dismiss based on an unassessed New Jersey State Tax return from 2012.

5. The debtors have addressed this unassess tax return and refiled this case with good faith intentions.

6. In light of the foregoing, the debtors respectfully are motioning the court to seek an order granting the continuation of the stay against all creditors for the duration of this Chapter 13 case.

Date: 6/5/2018

/S/ Joseph O'Connor
Joseph O'Connor, debtor